

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

CORNEL WEST AND MELINA
ABDULLAH, GERALDINE
TUNSTALLE, KATHERINE
HOPKINS-BOT, AND CHARLES
HIER,

Plaintiffs,

v.

PENNSYLVANIA DEPARTMENT OF
STATE AND AL SCHMIDT, IN HIS
CAPACITY AS SECRETARY OF THE
COMMONWEALTH,

Defendants.

PLAINTIFFS' MOTION FOR INJUNCTION PENDING APPEAL

Plaintiffs Cornel West, Melina Abdullah, Geraldine Tunstalle, Katherine Hopkins-Bot, and Charles Hier respectfully move this Court for an injunction pending appeal, pursuant to Rule 8 of the Federal Rules of Appellate Procedure, directing Defendants to accept the Nomination Papers of Cornel West and Melina Abdullah for President and Vice President, respectively, of the Justice for All political body and to take all reasonable and appropriate measures, consistent with pasts practice, to remedy the wrongful omission of their names. The grounds for this Motion are set forth in the accompanying Memorandum of Law.

WHEREFORE, Plaintiffs respectfully ask this Court to grant this Motion and enter the attached Proposed Order, which directs Defendants to:

(1) accept the Nomination Papers of Cornel West and Melina Abdullah for President and Vice President, respectively, of the Justice for All political body pending Plaintiffs' appeal;

(2) transmit an amended certification listing Cornel West and Melina Abdullah as candidates of the Justice for All political body for President and Vice President of the United States, respectively; and

(3) take all reasonable and appropriate measures, consistent with past practice, to place the names of Cornel West and Melina Abdullah on the ballot, or otherwise inform voters that West and Abdullah are duly qualified candidates for President and Vice-President of the United States by making postings in the same manner and to the same extent as in prior elections.

Respectfully submitted,

Dated: October 17, 2024

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**Pro Hac Vice forthcoming*

/s/ J. Andrew Crompton

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